Province of Alberta

Office of the
ETHICS COMMISSIONER

Annual Report 2009/10

under the ***Conflicts of Interest Act*** and the ***Lobbyists Act***

September 30, 2010

Hon. Kenneth R. Kowalski
Speaker of the Legislative Assembly
325 Legislature Building
Edmonton, Alberta
T5K 2B6

Dear Mr. Speaker:

It is my honour and privilege to submit to you the Annual Report of the Office of the Ethics Commissioner, covering the period from April 1, 2009 to March 31, 2010. Included in the Report is an update on the Lobbyists Registry.

This report is submitted pursuant to section 46(1) of the Conflicts of Interest Act, Chapter C-23 of the 2000 Revised Statutes of Alberta.

Yours very truly,

Neil R. Wilkinson
Ethics Commissioner

TABLE OF CONTENTS

3 Ethics Commissioner's Remarks

5 Our Role

8 Current Year's Activities

- Disclosure Process
- Provision of Advice
- Conduct of Investigations
- Requests for Information
- Comparative Statistics

14 Educational Initiatives

16 Business Plan Review – Looking Ahead

20 Lobbyists Act

- Registry Roll-out
- Contracts and RFPs
- Education
- Requests for Information
- Lobbyists Registrations
- Registry Website Activity
- Legislative Review
- Registrar's Remarks

28 Financial Statements

41 Contact Us

INTRODUCTION

It is my pleasure to submit the 2009/10 Annual Report for the Office of the Ethics Commissioner. Across the country the subject of ethics and lobbying generated a significant amount of attention in the media and with the public this last year. I continue to hold a tremendous appreciation for our MLAs and senior officials who serve all Albertans. We, in Alberta, are very fortunate to have officials of high ethical standards. I am also proud of the role my Office plays in advising and monitoring Members and senior officials to help them ensure they do not use their public office for private benefit.

All MLAs and senior officials annually submit disclosure statements, meet with me to discuss these statements and, on their own initiative, contact my Office for advice. The *Conflicts of Interest Act* is a self-governing piece of legislation. The obligation to avoid conflicts of interest rests with the Members and senior officials. The Office of the Ethics Commissioner's role is to assist in the interpretation of the Act and provide advice. If advice is followed, no proceedings or prosecution shall be taken. An alleged breach of the Act may result in an investigation. Members and senior officials effectively reconcile their duties of office and their private interests with integrity and impartiality in a manner that promotes public confidence and trust.

THE YEAR IN REVIEW

As I reflect over the last year, my Office experienced significant changes in both staffing and service delivery. Bradley V. Odsen, Q.C. joined the Office on May 4, 2009 as the Registrar, *Lobbyists Act*, and General Counsel, replacing Noela Inions, Q.C. who served a one-year secondment from the Office of the Information and Privacy Commissioner. Glen Resler, CMA commenced on January 4, 2010 as Chief Administrative Officer, replacing the retiring Karen South. We were fortunate to be able to provide a crossover training period before Karen's departure that resulted in a smooth transition.

Karen South, Senior Administrator was the first staff member hired to the Office of the Ethics Commissioner in 1992. She was a dedicated public servant for over 34 years and served the Province of Alberta with integrity and respect. We wish her well in her future endeavours.

The *Lobbyists Act* was proclaimed on September 28, 2009. The legislation specifies that lobbying public office holders is a legitimate activity. A balance exists between free and open access to government and the right to know who is accessing government. The Act also provides a mechanism by which the public and public office holders can know who is involved in lobbying and who is contracting with the Government of Alberta and provincial entities. This Act contributes to ethical leadership by its openness and accountability in government.

We developed, tested and successfully launched an online lobbyists registry system. A comprehensive communication strategy consisted of a new website (www.lobbyistsact.ab.ca), guides, brochures, publishing articles, and numerous speaking engagements to groups and individuals. System enhancements have occurred to ensure the Registry continues to meet the needs of registrants and all Albertans. We anticipated an active lobbyist community in Alberta and within six months, initial registrations included a total of 259 consultant and organizational lobbyists. We

are very pleased with the response and cooperation of the lobbyist community in complying with this new legislation.

Our office has been asked to assume some responsibility for code of conduct matters involving the Government of Alberta's various agencies, boards and commissions. Our role will be set out in Regulation under the *Alberta Public Agencies Governance Act*, and we look forward to working with these agencies in this area.

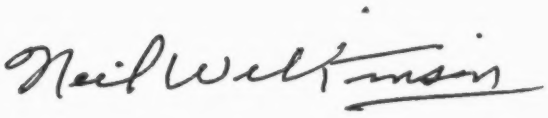
I continue to promote the role of the Office through speaking engagements, information sessions and new communication materials. We have participated in discussions with international delegations, political party caucuses, lobbyist stakeholders and community groups. The public's perception of the role of the Office is sometimes broader than our legislative mandate. It is my priority to ensure our outreach activities continue to educate the public, raising the awareness of the Office and reflect positively on the Assembly and its Members.

Our service agreement with the Office of the Information and Privacy Commissioner (OIPC) covering our human resource and finance support ceased on December 31, 2009. These services have been facilitated internally and through outsourced contracts effective January 1, 2010. Part of this process was the conversion of human resource records to the provincial information management system (IMAGIS) from Ceridian. I would like to thank the OIPC human resource and finance staff for their support and training assistance during this transition.

IN CONCLUSION

2009/10 has been a very productive and fulfilling year. Our achievements could not have been possible without the dedicated staff in our Office: Val Henkel and Louise Read, Administrative Assistants; Brad Odsen Q.C., Registrar, Lobbyists Act and General Counsel; Glen Resler, Chief Administrative Officer and finally, Karen South, Senior Administrator (retired).

Thank you for the privilege of serving Albertans, the Legislative Assembly and senior officials.



Neil R. Wilkinson
Ethics Commissioner

MANDATE

The Office of the Ethics Commissioner exists as a result of and operates under the *Conflicts of Interest Act*, Revised Statutes of Alberta 2000, Chapter C-23 ("COI Act"). The Office is also responsible for the administration of the *Lobbyists Act*, Statutes of Alberta 2007, Chapter L-20.5 (*"Lobbyists Act"*).

The Ethics Commissioner is an Officer of the Legislature and is appointed by Order-in-Council following passage of a motion in the Legislative Assembly approving the appointment. The motion follows a report and recommendation from the Special Committee appointed to search for and recommend the appointment of the Ethics Commissioner.

The Ethics Commissioner reports to the Legislative Assembly through the Speaker with respect to annual reports, investigation reports, and matters relating to the Commissioner's jurisdiction or authority, with the exception of administrative matters. The Ethics Commissioner presents budgetary estimates through the Standing Committee on Legislative Offices. The Legislative Assembly approves the budget for the Office of the Ethics Commissioner.

The Ethics Commissioner may delegate some of his functions under the *Lobbyists Act* to the Registrar.

CONFLICTS OF INTEREST ACT

The preamble of the *Conflicts of Interest Act* describes its basic principles as follows:

- the ethical conduct of elected officials is expected in democracies;
- Members of the Legislative Assembly can serve Albertans most effectively if they come from a spectrum of occupations and continue to participate actively in the community;
- Members of the Legislative Assembly are expected to perform their duties of office and arrange their private affairs in a manner that promotes public confidence and trust in the integrity of each Member, that maintains the Assembly's dignity and that justifies the respect in which society holds the Assembly and its Members; and
- Members of the Legislative Assembly, in reconciling their duties of office and their private interests, are expected to act with integrity and impartiality.

Through the COI Act, the Ethics Commissioner:

- promotes the understanding of the Members' obligations under the Act;
- receives disclosure statements from all 83 Members of the Legislative Assembly (MLA) and from those public servants whose positions are designated as senior official positions;
- provides advice to MLAs under the Act, either on an individual basis or generally to all or groups of MLAs (including former Members) and to current or former political staff members and senior officials as defined in the COI Act;
- provides advice under the Alberta Public Service Post-Employment Restriction Regulation to those individuals who are covered by post-employment restrictions as set out in that Regulation; and
- investigates any matter respecting an alleged breach of this Act by a Member, former Minister or former political staff member.

Upon receiving a report from the Ethics Commissioner, the Speaker is required to make the report public. If the Legislature is in session, the report is tabled at that time in the Legislature. If the Legislature is not in session, the report is released publicly and tabled when the Legislature next sits (Reference: section 28 of the *COI Act*). If the Ethics Commissioner has recommended a sanction in an investigation report, the Legislative Assembly shall debate and vote on the investigation report within 15 days after the tabling of the report, or such other period determined by a resolution of the Legislative Assembly.

Under section 29 of the *COI Act*, the Legislative Assembly may accept or reject the findings of the Ethics Commissioner or substitute its own findings and may, if it determines that there is a breach, impose the sanction recommended by the Ethics Commissioner or any other sanction referred to in section 27(2) it considers appropriate, or impose no sanction. The Ethics Commissioner reports and makes recommendations to the Assembly. The Legislative Assembly has full and final authority with respect to disciplinary matters relating to its Members.

LOBBYISTS ACT

The *Lobbyists Act* is intended to enhance the integrity and accountability of government by fostering openness and transparency about who is influencing the decisions of public office holders. The *Lobbyists Act* establishes two categories of lobbyists: consultant lobbyists and organization lobbyists. The *Lobbyists Act* forbids a person from performing the activities of lobbying and providing paid advice on the same subject matter, unless an exemption is given.

The preamble of the *Lobbyists Act* describes its basic principles as follows:

- free and open access to government is an important matter of public interest;
- lobbying public office holders is a legitimate activity;
- the public and public office holders should be able to know who is engaged in lobbying activities;
- a system for the registration of paid lobbyists should not impede free and open access to government; and
- the public and public office holders should be able to know who is contracting with the Government of Alberta and provincial entities.

The Office of the Ethics Commissioner maintains a web-based lobbyists registry that enables real-time registration by lobbyists and is searchable by the general public.

The lobbyists registry provides openness, transparency and:

- a record of the identities and activities of those who are paid to influence the decisions of public office holders;
- a record of the identities of organizations and clients who pay lobbyists to influence the activities of public office holders on their behalf;
- allows lobbyists to register, update, renew and terminate their own registrations on the system; and
- allows public scrutiny as the public will be able to view, search and obtain statistics and reports about lobbyists free of charge through the Internet.

An accessible web-based registry allows access 24 hours per day, seven days a week at the convenience of the public and lobbyists.

The Ethics Commissioner reports to the Legislative Assembly through the Speaker with respect to investigation reports under the *Lobbyists Act*. After the report is prepared, the Ethics Commissioner provides the report to the Speaker of the Legislative Assembly and the report is tabled if the House is sitting. If the House is not sitting, the report is distributed to all Members of the Legislative Assembly. After distribution, the Ethics Commissioner may make the report public. A report that is provided when the House is not sitting is tabled when the House next sits (section 17 of the *Lobbyists Act*).

If the Registrar determines a contravention occurred under this Act or its regulations, that person may be subject to an administrative penalty up to $25,000. A person who lobbies without being registered; provides false or misleading information in the registration; or performs the activities of lobbying and providing paid advice on the same subject matter is guilty of an offence. A first offence may result in a fine of not more than $25,000 and each subsequent offence up to $100,000. If warranted, the Ethics Commissioner may prohibit a person from lobbying for a period of not more than 2 years. A notice of an administrative penalty or a prosecution for an offence may not be commenced more than 2 years after the date on which the contravention occured.

DISCLOSURE PROCESS

All Members and senior officials have complied with their obligations to file disclosure statements within the appropriate timelines. Compliance is still dependent on the support of Caucus Whips, reminder letters and phone calls initiated by our Office. I wish to thank caucus staff for their efforts in ensuring Members continue to comply at the 100% level.

New this year, a Guide was developed to assist MLAs in completing their disclosure statements. It addressed many frequently asked questions pertaining to information being requested. Feedback received has been positive in its usefulness. The Guide is available on our website.

The Ethics Commissioner received private disclosure forms from 84 Members. The extra submission resulted from the resignation of the Honourable Ron Stevens on May 15, 2009 and Paul Hinman, MLA who was successful in the byelection held on October 9, 2009. The Commissioner met with 83 Members to discuss their disclosure documents. The MLA public disclosure statements were made available through the Office of the Clerk of the Legislative Assembly.

Senior officials are also required to submit disclosure statements, similar to MLAs. This is in addition to their obligations under the *Code of Conduct and Ethics for the Public Service of Alberta*. A total of 87 disclosure meetings were held with senior officials. When reviewing the disclosures of senior officials of agencies, boards and commissions, we will also look at compliance with their internal conflict of interest policies. The disclosure directive does not require senior official statements to be made public.

The disclosure statements include:

- the Member or senior official, their spouse or adult interdependent partner and minor children disclosing all assets, liabilities, and financial interests of any private corporation in their control. Investments in a blind trust are excluded.
- identifying any legal proceeding brought against them; and
- stating whether there are arrears in maintenance payments.

The following is a measure of the compliance in reporting financial disclosure.

Disclosure Statement Timelines

Category of Filer	Forms Distributed	Submission Deadline	Compliance
Members of the Legislative Assembly	**March 23, 2009**	**June 1, 2009**	**100%**
Senior Officials	**September 21, 2009**	**December 1, 2009**	**100%**

PROVISION OF ADVICE

Members, senior officials and political staff members are provided protection against allegations of a breach if they seek and adhere to the Commissioner's advice. This advice is placed in writing. A confidential searchable database of requests and responses is maintained by the Office for future reference. When providing advice it is important to ensure that similar requests for advice are responded to consistently.

In January 2010, the Premier announced a new Cabinet team resulting in some changes to Executive Council. This resulted in some changes to senior officials and political staff members. Our Office reviewed the files of the new Ministers and senior officials to ensure their new responsibilities aligned with the *Conflicts of Interest Act* and directive. In some cases where an investment was previously approved, the approval had to be reconsidered in light of the new responsibilities.

Below is a comparison of the most common types of advice provided by our Office in 2009/10 in comparison to the previous year 2008/09 followed by a brief description of each type of advice. In 2009/10, we experienced an 8% increase in the number of requests for advice.

Requests For Advice

Types of Advice	2009/10	2008/09
Gifts	36	29
Taking Part in Decisions	15	15
Investments	13	14
Other	10	8
Outside Activities	9	8
Codes of Conduct	8	2
Family	7	4
Contracts with the Crown	6	2
Constituency Issues	3	10
Post Employment	3	10
Total	110	102

Gifts

As noted in previous annual reports, the most frequently asked questions are about gifts. The close proximity of the Vancouver Olympics resulted in the Government of Alberta being involved and private industry offers for attendance at events. This resulted in an increase in requests for advice. Questions continue to be raised about the acceptability of tickets to sports events, various fundraisers and acceptance of non-commercial flights. Many Members track all gifts, including tickets to events, to ensure that they were mindful of both the value of cumulative gifts they might receive from one source and any connections between a source and the Member's public responsibilities.

Taking Part in Decisions

Generally, Members consider their personal holdings or those of close family members and ask whether it is appropriate to participate in a decision before the Legislative Assembly or one of its committees, or before Executive Council or one of its committees. My Office will advise whether a private interest is involved or whether the matter may be one of general application or affect the Member as one of a broad class of the public.

Investments

A total of 13 requests were made in 2009-10 with respect to investments. The chart below shows the response given to the request and the compliance measurement taken, if required.

Investment Advice

Category of Advice	Compliance
Potential conflicts discussed; no immediate concerns	Based on discussions, all filers are in compliance
Advice that either an investment(s) be divested or blind trust be established	As at year's end, required actions have been taken or are in process
Correspondence exchanged to clarify investment instruments used and potential for influence directly in investment decisions or influence of value of investment through official decision-making	Clarifications resulted in advice that investments may be retained in the current instruments; obligations to withdraw noted where applicable

Other

This category includes advice requests relating to Members participating on boards of charities or other not-for-profit entities; questions relating to disclosure statements; provision of references and retaining professional memberships.

Outside Activities

Questions regarding outside activities are almost exclusively raised by Private Members. For new Members, the question is most frequently related to what they may continue to do and whether there are identifiable conflicts in continuing to have outside employment. There may be a link between these questions and questions relating to a Member's obligations to withdraw where a private interest has been identified. With respect to questions surrounding a Member's ability to take part in a decision, the primary focus is on whether a private interest exists or whether the matter is one of general application or one that affects a Member as one of a broad class of the public.

Codes of Conduct

Under the *Alberta Public Agencies Governance Act* and regulations, our office has been asked to assume some responsibility for code of conduct matters involving the Government of Alberta's various agencies, boards and commissions. Several boards sought our advice on aspects of their agency's code of conduct. The Act received Royal Assent on June 4, 2009 and is expected to be proclaimed in 2010.

Included in 2008/09, my Office was asked to review or comment on certain non-health-related appointments.

Family

Questions involving family members related to either the employment or activities of a spouse or child. If the question involved a family member's investments, that question is included in the investments category.

Constituency Issues

Constituency issues related to two main types of requests: providing assistance to constituents or use of a constituency allowance. Where questions relating to the Member's constituency allowance are more properly within the mandate of the Office of the Speaker, the Member is referred to that Office.

Contracts

Contract questions are often raised by new Members with respect to their dealings with ATB Financial or other contracts with the Crown.

Post-Employment

Post-employment questions are raised by departing Ministers, senior officials and political staff members.

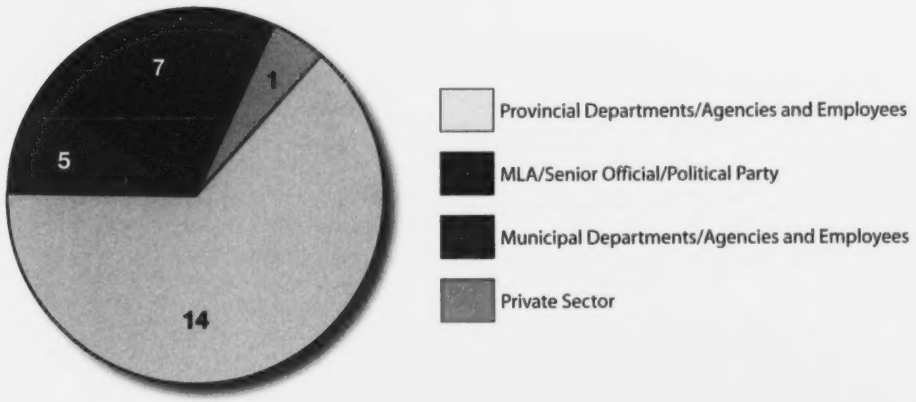
CONDUCT OF INVESTIGATIONS

No investigations were commenced under the Act during 2009/10; nor were there any investigations carried forward from last year.

The majority of the requests for investigation to my Office involve matters that are non-jurisdictional. Where a request involves an MLA, the matter discussed did not fall under the *Conflicts of Interest Act*. The incident usually involves an action of a department or an MLA that a citizen is in disagreement. When requests are non-jurisdictional, citizens are referred to the appropriate office for assistance.

The following pie chart illustrates the categories of jurisdictions in which we are requested to investigate. The total number of requests for investigations has increased by 35% over the previous year.

Requests for Investigations (Total: 27)



The following table illustrates the length of time to respond to the requests for investigation. Letters tend to be more detailed, resulting in a longer time frame to respond.

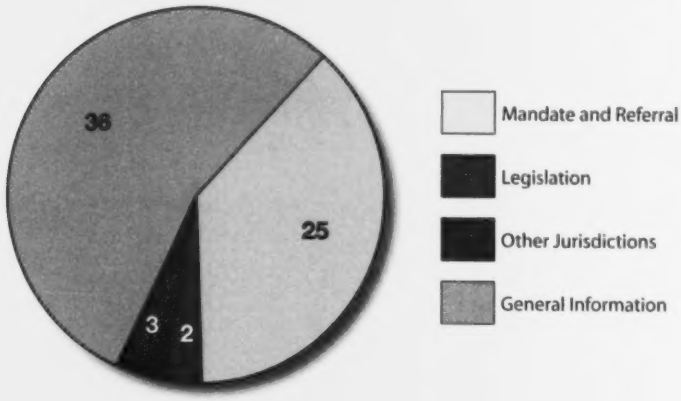
Length of Time to Respond to Requests for Investigation			
Method of Request (Number of Requests)	Same Day	24-48 Hours	One Week or More
Phone Calls (9)	8	1	0
E-mails (15)	5	4	6
Letters (3)	0	0	3

REQUESTS FOR INFORMATION

The majority of requests for information received by the Office are from callers seeking clarification of the mandate of the Ethics Commissioner. Callers are referred to the appropriate office to address their issue if we are unable to assist them.

There were 66 requests for information representing a 6% decrease over last year. The following chart categorizes the requests:

Requests for Information (Total: 66)



COMPARATIVE STATISTICS

The chart below reflects the volume of requests received by our Office that deal with the total requests for advice, investigation and information.

Total Requests Received for:	2009/10	2008/09
Advice	110	102
Investigations	27	20
Information	66	70
Total	203	192

The total requests received in 2009/10 are an increase of 6% over the levels in 2008/09.

ETHICS EVENTS OR CONFERENCES

The annual Canadian Conflicts of Interest Network (CCOIN) conference was held in Whitehorse in 2009. Both the Ethics Commissioner and the Senior Administrator attended. Karen South was recognized for her years of service in the ethics field furthering the integrity of our institutions and her contribution in supporting jurisdictions across the country. The Lobbyists Registrar and the Ethics Commissioner attended the annual Lobbyists Registrars and Commissioners conference in Victoria and the Council of Governmental Ethics Laws (COGEL) conference in Phoenix, Arizona.

These annual conferences are very beneficial to our small office as they provide Commissioners and staff with the opportunity to exchange information on issues of common interest and review legislative and regulatory differences and trends.

SPEAKING ENGAGEMENTS / PRESENTATIONS

Date	Presentation, Speech or Caucus Session
May 12, 2009	South Edmonton Rotary Club
May 27, 2009	Russian Study Tour Group
August 25, 2009	Liberal Caucus, "private interest" discussion
September 17, 2009	New Democrat Caucus, "private interest" discussion
September 21, 2009	Representatives of the PC Caucus, "private interest" discussion
October 21, 2009	School at the Legislature, St. Angela
November 18, 2009	Shanghai Administration Institute
January 6, 2010	School at the Legislature, Queen Alexandra
January 13, 2010	School at the Legislature, Forest Heights
March 23, 2010	Toastmasters, Ethics

Presentations performed by the Lobbyist Registrar are detailed on page 22 of this Report.

PUBLICATIONS

The Quick Guide to Determining Whether an MLAs Interest is a 'Private Interest' was developed as a result of the Speaker of the Legislative Assembly ruling on a Point of Privilege raised by Dr. Kevin Taft, Member for Edmonton Riverview. In his June 3, 2009 ruling, the Speaker requested the Ethics Commissioner provide a general overview of the interpretation of what might constitute a private interest of such a nature to require a Member to absent himself or herself from the proceedings in the Assembly, committee or other forum. Members feel strongly about the role in

representing constituents' concerns. Their ability and responsibility to participate in public policy decisions is one of the most important roles carried out by Members. Each Member's situation is to be reviewed individually to determine:

- whether their interest in a matter is trivial or significant;
- who is affected by the decision: is it of general application affecting all Albertans; and
- does the interest affect a person of a broad class of the public (ex. all teachers).

These and other questions need to be answered in order for the Member to determine if he/she can participate and vote in the matter. The Quick Guide will assist Members in determining whether a 'private interest' exists and whether the Member is required to withdraw.

The second publication developed this last year was a guide to assist new MLAs in completing disclosure statements.

Part of our performance measurement process will include a routine review of all of our brochures or guides to ensure that they are current with respect to the relevant legislation or regulation. We also wish to ensure that our educational information is as user-friendly as possible. We encourage you to review our materials and provide us with your comments for improvements.

We currently produce the following brochures under the *Conflicts of Interest Act:*

- Background and Role of the Ethics Commissioner
- Conflicts of Interest
- Disclosures Statements / Gifts
- Members of Executive Council
- Investigations / Inquiries
- Ethics—School Presentation
- Alberta Public Service Post-employment Restriction Regulation
- Public Service Post-employment Obligations for Political Staff Members
- Quick Guide to Determining Whether My Interest is a "Private Interest"
- Information for Candidates Seeking Election

Under the *Lobbyists Act:*

- Am I a Lobbyist?
- Are You a Lobbyist?
- What is Lobbying?
- Contracting Prohibitions

All publications listed above can be found on our website at:
www.ethicscommissioner.ab.ca

BUSINESS PLAN REVIEW – LOOKING AHEAD

We are committed to promoting public confidence and trust in the integrity of elected Members of the Legislative Assembly and senior officials of the Alberta public service by ensuring obligations under the *Conflicts of Interest Act* are met. In addition, we will promote the accountability and transparency of the lobbyists registry.

Over the last few months, all staff have been involved in the review and revision of our strategic documents to ensure we have a clear understanding of our vision, mission, values and principles. We analyzed our strengths, weaknesses, opportunities and threats to identify internal and external factors that may impact the achievement of our objectives. This has resulted in a clear set of goals and objectives that align with our business strategy to ensure we continue to improve the services we provide to all Albertans.

The following 2010/11 – 2012/13 Strategic Business Plan will help guide the Office to success in the coming years.

VISION

Albertans have confidence and trust in the integrity of their public institutions.

MISSION

Foster and encourage ethical conduct through education, public disclosures, provision of advice and investigations.

VALUES

Our values:

- Collaborative
- Confidentiality
- Dependability
- Impartiality
- Integrity
- Leadership
- Respectful
- Selflessness
- Supportive
- Trustworthy

PRINCIPLES

Serving the public with impartiality and independence

Fostering integrity in a respectful and supportive environment

Leading by providing service that is responsive, innovative, dependable and helpful

Embracing confidentiality as paramount to our trusted relationships

Guiding public officials to reflect the values of our legislation in their everyday decision-making

GOALS AND STRATEGIES

Goal #1: Promotion and Understanding of Legislative Obligations

1. Review disclosure statements filed by Members and senior officials
   a. Ensure all statements are received and on time
2. Hold disclosure meetings with Members and senior officials
   a. Build trust relationship with stakeholder
   b. Discuss issues or concerns
   c. Encourage raising issues or concerns throughout the year
3. Meet with caucuses or caucus representatives
   a. At our request, to discuss specific issues
   b. By caucus invitation to discuss general issues
4. Review registration forms filed by lobbyists
   a. Send renewal reminder emails
   b. Review new registrations and renewals
5. Develop and maintain communication materials to aid in the understanding of legislation
   a. Ensure publications are current and relevant (annual measure)
   b. Develop new communication materials (from feedback from disclosure meetings and lobbyists; changes to legislation/regulation)
   c. Provide Albertans with adequate information to assess whether obligations have been met
   d. Office newsletter (2-3 times per year)
   e. Publish articles promoting the lobbyists registry
   f. Media notices on the status of the lobbyists registry
6. Provide guides to stakeholders to assist in legislative compliance
   a. Financial disclosure statements; and
   b. Lobbyists online registration system
7. Create user-friendly forms
   a. Ensure only relevant information is collected
   b. Dynamic web forms for easy completion for lobbyists registration
8. Review and update websites to ensure:
   a. Currency and relevancy
   b. Review ability to complete disclosure forms online as part of website design review
9. Increase the public's awareness of the Office of the Ethics Commissioner (OEC) and its mandate
   a. Acceptance of speaking engagements
   b. Participation on panels at conferences
   c. Respond to requests for information from citizens and media
10. Develop stakeholder training programs
    a. Meet with interested groups to provide guidance on compliance under the *COI* and *Lobbyists Acts*

Goal #2: Promote Public Trust and Confidence

1. Provide the public access to MLA financial disclosures
   a. Accessible through the Office of the Clerk (annually)
2. Enhance and maintain an online lobbyist registry
   a. Provides openness and transparency
   b. Allows public scrutiny by enabling online view, search, statistics and reports of lobbyists activities

3. Conduct investigations (when appropriate)
   a. *Conflicts of Interest Act*
      i) Investigate allegations of breach by a Member
      ii) Report on investigation conducted
      iii) Recommend sanctions, if any
   b. *Lobbyists Act*
      i) Investigate allegations of breach
      ii) Report on investigation conducted
      iii) Take enforcement action, if any
4. Review administrative penalties and offense provisions under *Lobbyists Act*
   a. Develop processes for handling potential offenses and de-registration
5. Identify legislative issues
   a. Participate in mandated legislative review process
   b. Compile information on potential legislative issues as they arise
   c. Ensure legislative review committees receive current information on legislation across the country and on practices and processes used by the OEC in the provision of stakeholder services
6. Maintain library for ethics / lobbyist resources

Goal #3: Maintain Highest Quality Advice and Information

1. Promote OEC as the best resource for information and advice on conflict of interest and lobbying issues
   a. Serve stakeholders in an impartial, independent and confidential manner
   b. Embrace new jurisdictions by promoting OEC vision / mission (example *Alberta Public Agencies Governance Act*)
   c. Engage stakeholders on value of service provided
2. Ensure consistency in responses to requests for advice
   a. Review previous advice provided on subject matter
   b. Review current legislation
3. Maintain a searchable advice database (lobbyists and COI)
   a. Ensure all requests and advice provided are entered into databases
4. Provide referral service to non-jurisdictional requests
   a. Communicate OEC role
   b. Suggest alternative sources for assistance
5. Develop professional network with national / international offices (lobbyist registrars and COI)
   a. Provide materials or advice in response to requests from other jurisdictions
   b. Request information from other jurisdictions / interpretation of legislation
   c. Attend / participate in conferences

Goal #4: Support Workplace Wellness and Staff Development

1. Review annual performance appraisal process and documentation linking performance evaluation with achievements and to identify learning plans
   a. Ensure best practices are used
2. Ensure staff remain current to perform their responsibilities
   a. Provide funding in office budget to address learning plans
3. Maintain memberships in organizations that enhance the knowledge and skills of staff
   a. Professional associations: law society, accounting society
   b. COGEL, CCOIN, Lobbyist Registrars

4. Sufficient staff to meet the needs of the Office
   a. Review service levels to determine adequacy of service levels
   b. Succession planning
5. Foster a positive work environment
   a. Implement quarterly staff meetings
   b. Participate in Casual Fridays
   c. Social events
   d. Review hours of work
      1) Flexible work arrangements
      2) Close office during lunch hours
6. Office lease expiry March 31, 2012 – review options, including renewal

REGISTRY ROLL-OUT

Bradley V. Odsen, Q. C. assumed the Office of Registrar in May 2009. One of his first priorities was to complete the development of the online registry and website. A target of the end of July for completion of Version 1.0 and commencement of testing of the registry was set. By working closely with the developer, we were able to commence testing of the functionality and user-friendliness of the site the last week of June, 2009.

We had been contacted by a number of organizations and consultant lobbyists indicating they would be prepared to assist us with our testing. We were able to utilize these very generous offers as part of our testing process.

Testing took place in July and August 2009. By the end of August we were satisfied that the website and online registry was fully operational and advised the Office of the Premier.

The Lobbyists Act and General Regulation were proclaimed on September 28, 2009 and the registry went "live" at 12:01 AM on that date.

By section 4 of the Act, consultant lobbyists were required to register existing undertakings within 30 days of the Proclamation of the Act, and there was significant compliance by consultant lobbyists, with relatively few technical issues arising.

By section 5 of the Act, organization lobbyists were required to register within two months of the Proclamation of the *Act*. Due to the sheer volume of traffic on the website and the amount of information being provided by many organization lobbyists, the system revealed some technical deficiencies. Accordingly, system modifications were required to enable the system to cope with these high volumes. It should be noted that as we went through the issue resolution and system enhancement process, virtually every organization lobbyist with whom we dealt showed great patience and understanding, which we much appreciated.

Following the initial rush of the registration of consultant and organization lobbyists, there has been a steady and continual flow of new registrations (as new undertakings are entered into or lobbying efforts begun) and changes to existing registrations (as changes in the posted information have arisen). It should also be noted that a number of both consultant and organization lobbyists have commented on the user-friendliness of our online registry, as well as on the assistance they received in their efforts to comply with the legislation.

CONTRACTS AND RFPs

As noted in the 2008/09 Annual Report, all of the contracts for the various services required to create the registry were entered into in that period.

In 2009/10, there was:

- one Change Notice for an additional $10,000.00 in the site development contract with AAD Inc. which was necessitated, as mentioned above, by the issues presented once the registry went live; and

- a three-year contract was entered into with AAD Inc. to host both the Lobbyists Act website, and the Office of the Ethics Commissioner (OEC) website. This was necessitated by the fact that we had been advised by the Legislative Assembly office that it could not host the Lobbyists Act website and registry, and that it would not continue to host the OEC website. The new hosting agreement includes up to eight hours monthly of maintenance and development. It also addresses our business resumption/disaster recovery requirements by providing maximum protection and recovery at an off-site location in the event of a disaster (such as, for example, a fire in the OEC that destroys the OEC servers).

EDUCATION

Educational outreach activities were begun by the Registrar in 2008/09 and as the date for Proclamation of the Act grew ever closer, engaging stakeholders became more and more significant. In 2009/10 several approaches were taken to increase awareness of the application of the Act to the lobbying community, the legislature and government, and the general public.

In addition to the printed materials developed by Ms. Inions which are available at the Office of the Ethics Commissioner and posted on the registry website, several PowerPoint presentations were developed for use in presentations by the Registrar to various groups, as well as a generic PowerPoint presentation which was posted to the registry website.

The Registrar also authored articles which were published in:

- *Law Matters* – the quarterly magazine published by the Canadian Bar Association – Alberta branch and distributed to all lawyers in Alberta;

- *Law Now* – the quarterly legal information magazine published by the Legal Resource Centre, and distributed to public and school libraries across Alberta and beyond, as well as to numerous organizations engaged in public legal education activities, law offices and other business enterprises, and interested individuals; and

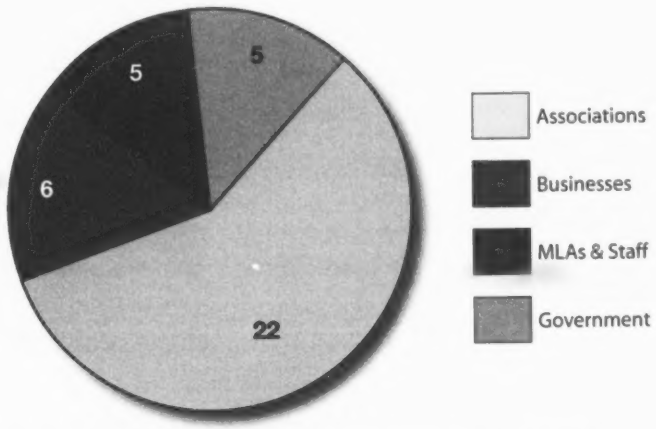
- *Spotlight* – the quarterly magazine published by the Institute of Chartered Accountants of Alberta, and distributed to the offices of every Chartered Accountant in Alberta.

The advantage gained by publishing articles on the Act in these three publications is that they collectively reach tens of thousands of business advisors and legal educators.

Media attendances in 2009/10 have included interviews given for articles published in the *Edmonton Journal, Calgary Herald, Edmonton Sun, Lawyer's Weekly, Red Deer Advocate, Insight Into Government, and the Armet Report*. On September 28, 2009, at the media event hosted to publicize the launch of the registry website and Proclamation of the Act, on-camera interviews were given to CBC French, CBC English, and CTV.

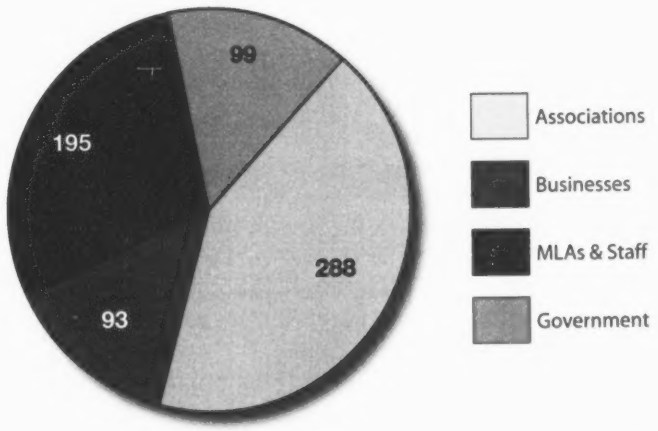
But by far the most significant outreach activity has been the Registrar giving presentations to interested groups. From the outset, whenever a telephone or email query was received by the Registrar, in addition to responding to the query, the Registrar has also indicated that a presentation to the party making the request was available. In particular, the Registrar endeavoured to make as many presentations as can be arranged with the membership of Associations – the strategic efficiency of presenting to a broad group of individuals representing various interests being the primary goal. Thirty-eight presentations were delivered in the period from May 04, 2009 to March 31, 2010 as illustrated in the diagram below. The majority of the presentations have been made in Edmonton, but the Registrar has also presented in Calgary and Fort McMurray. The government presentations were delivered jointly with Joan Neatby, Senior Legislative Counsel of Alberta Justice.

Number of Presentations (Total: 38)



In the 38 presentations, there have been a total of 675 attendees.

Number of Attendees at Presentations (Total: 675)



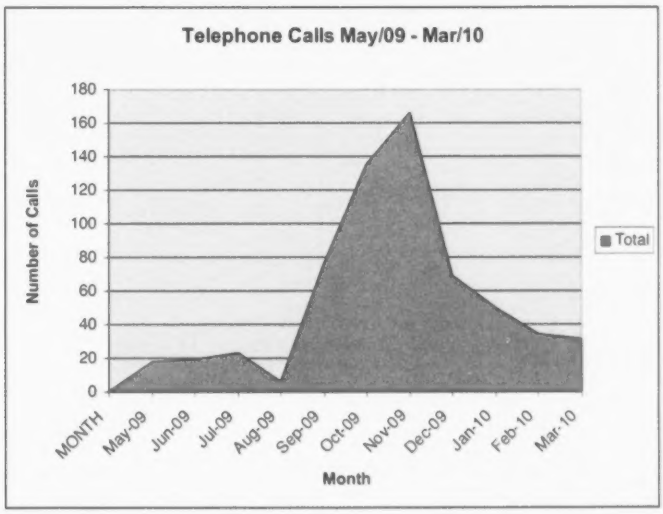
Presentations continue to be delivered in the 2010/11 period, though with less frequency. There are fewer and fewer organizations that engage in lobbying activities that are still unaware of the Act and its implications for them.

Presenting to the Annual Meeting of the Alberta Chambers of Commerce in Edmonton, November 04, 2009.

REQUESTS FOR INFORMATION

As expected, requests for information and presentations from Consultant and Organization Lobbyists and other interested parties concerning the obligations and requirements under the Act ramped up as the September 28, 2009 proclamation date approached and peaked after the Act was proclaimed. After the initial period following proclamation, users became more familiar with the operation of the online registry and the number of contacts began to diminish. This is illustrated in the table below:

Telephone Activity – Lobbyists Act & Registry Only



Communications concerning the Act and registry took place electronically (via email) and by telephone. In the period from May through September, the vast majority of the queries concerned the Proclamation date, and how the registry would operate. Following Proclamation, the overwhelming majority of the communications concerned whether registration was required, advice on completing the registration form online, and technical issues encountered by users from time to time.

During this period, 3,773 emails were received regarding the Lobbyist Act and Registry queries; an average of 343 per month.

Our achievements in communications and customer service are as follows:

Response to Oral and Email Inquiries	Actual	Target
Respond to voicemails within 4 hours	98%	90%
Respond to emails within 1 business day	95%	90%
Respond to service request within 2 hours	99%	95%
Resolve service issue within 2 days	85%	75%

LOBBYISTS REGISTRATIONS

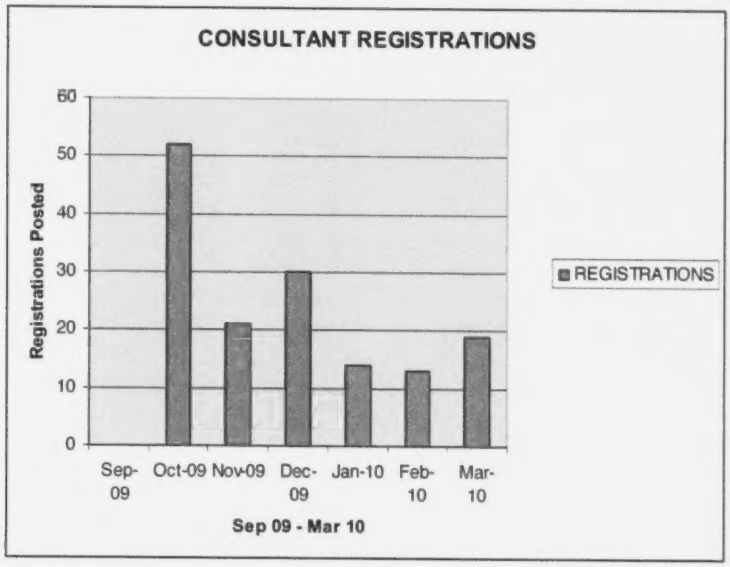
The response from the lobbying community to the Act and Registry has been overwhelmingly positive. In the period from the Proclamation date, September 28, 2009, to March 31, 2010, there were a total of **259** individual registrations posted on the registry website.

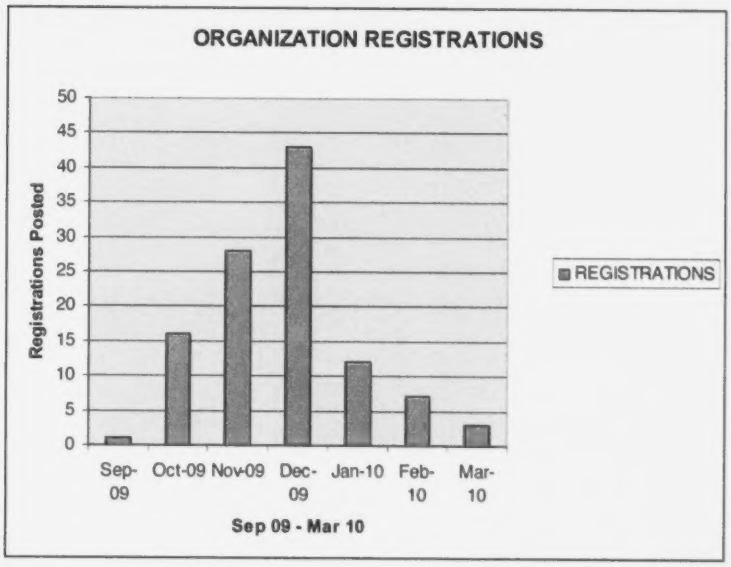
Posted Registration Returns as at March 31, 2010

CONSULTANT LOBBYIST - REGISTERED UNDERTAKINGS	ORGANIZATION LOBBYISTS - REGISTERED ORGANIZATIONS
149	110

The breakdown of registrations approved and posted by month is as follows:

REGISTRY WEBSITE ACTIVITY





The purpose of the *Lobbyists Act* is found in its Preamble:

Preamble

WHEREAS free and open access to government is an important matter of public interest; and

WHEREAS lobbying public office holders is a legitimate activity; and

WHEREAS it is desirable that the public and public office holders be able to know who is engaged in lobbying activities; and

WHEREAS a system for the registration of paid lobbyists should not impede free and open access to government; and

WHEREAS it is desirable that the public and public office holders be able to know who is contracting with the Government of Alberta and Provincial entities;

One indicator of whether the legislation is fulfilling its stated purpose is by tracking the activity on the registry website. The statistics on website usage are as follows:

Website Registry Activity September 28, 2009 – March 31, 2010

MONTH	UNIQUE VISITORS	NUMBER OF VISITORS	PAGES	HITS
Sept. 2009	201	386	4,481	18,417
Oct. 2009	874	2,424	54,412	155,994
Nov. 2009	1,476	3,970	91,372	271,530
Dec. 2009	2,136	3,828	56,663	162,002
Jan. 2010	2,556	4,048	42,111	126,863
Feb. 2010	2,112	3,290	34,869	102,401
Mar. 2010	2,063	3,248	28,569	88,015
TOTAL	**11,420**	**21,194**	**312,477**	**925,222**
AVERAGE*	**1,631**	**3,028**	**44,640**	**132,175**

* The monthly average will be skewed, as there were only three days in September 2009 when the website was operational (September 28, 29 and 30).

It can safely be surmised that having over 21,000 visits in the first six months of operation of the registry website clearly demonstrates that those with an interest in making use of the website are doing so, and the purpose of the legislation is being met.

LEGISLATIVE REVIEW

As previously noted, the *Lobbyists Act* was Proclaimed on September 28, 2009. By section 21 of the Act:

> **Review of Act**
>
> **21** Within 2 years after this Act comes into force and every 5 years after that, a special committee established by the Legislative Assembly shall begin a comprehensive review of this Act and shall submit to the Legislative Assembly, within one year after beginning the review, a report that includes any amendments recommended by the committee.

Also as previously noted, the Act is complex, and most issues that arise in relation to its interpretation and application concern questions of fact. Telephone and email logs, as well as a database of queries and responses, provide a picture of the issues that arise most often for lobbyists and the Registrar.

Commencing in the Fall of 2010, the Registrar will undertake a comprehensive policy analysis of the first year of operation of the registry and application of the Act. A part of this policy analysis will entail a survey of a representative sample of users to gauge their experiences in making use of the registry, as well as gathering comments and suggestions on the Act.

REGISTRAR'S REMARKS

As the foregoing shows, 2009/10 has been a year of challenge and accomplishment. From completing the design, coding, testing, and initialization of the website and registry in the space of five months, to a hectic schedule of educational presentations to a diversity of audiences, to responding to lobbyists queries and concerns, and to addressing technical issues in as timely and effective a manner as possible. These challenges could not have been met, and the accomplishments made, without the diligent support and effort of:

- Neil Wilkinson, Ethics Commissioner – constant support, encouragement, and critical advice;
- Karen South and Glen Resler, Sr. Administrator OEC – business support and encouragement;
- Val Henkel and Louise Read, Reception OEC – administrative support;
- The lobbyists too numerous to mention for their cooperation, patience and understanding;
- Rob Wright, AAD Inc. – website design, hosting, and webmaster; and
- Jaan Chuey, Longview Systems – IT support.

There can be no doubt that the *Lobbyists Act* and Registry have made a significant contribution to openness, transparency, and accountability of government in Alberta. It is an honour and privilege to have the opportunity to contribute to the realization of this vision.

OFFICE OF THE ETHICS COMMISSIONER

Financial Statements - March 31, 2010

OFFICE OF THE ETHICS COMMISSIONER

Financial Statements

Auditor's Report

Statements of Operations

Statements of Financial Position

Statements of Cash Flows

Notes to the Financial Statements

Schedule 1 – Salary and Benefits Disclosure

Schedule 2 – Allocated Costs

AUDITOR GENERAL
Alberta

Auditor's Report

To the Members of the Legislative Assembly

I have audited the statements of financial position of the Office of the Ethics Commissioner as at March 31, 2010 and 2009 and the statements of operations and cash flows for the years then ended. These financial statements are the responsibility of the Office's management. My responsibility is to express an opinion on these financial statements based on my audits.

I conducted my audits in accordance with Canadian generally accepted auditing standards. Those standards require that I plan and perform an audit to obtain reasonable assurance whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation.

In my opinion, these financial statements present fairly, in all material respects, the financial position of the Office as at March 31, 2010 and 2009 and the results of its operations and its cash flows for the years then ended in accordance with Canadian generally accepted accounting principles.

Merwan N. Saher
CA
Auditor General

Edmonton, Alberta
June 21, 2010

STATEMENT OF OPERATIONS
FOR THE YEAR ENDED MARCH 31, 2010

	2010		2009
	Budget	Actual	Actual
Revenues			
Prior Year Expenditure Refund	$ -	$ 8,048	$ 143
Other Revenue	-	6	728
	-	8,054	871
Expenses – Directly Incurred (Note 3(b) and Schedule 2)			
Voted			
Salaries, Wages, and Employee Benefits	559,500	535,147	523,541
Supplies and Services	400,500	177,629	176,245
Supplies and Services from Support Arrangements with Related Parties (Note 7)	25,000	18,750	20,000
Amortization of Tangible Capital Assets	6,000	32,818	4,457
Total Voted Expenses	991,000	764,344	724,243
Statutory			
Valuation Adjustments			
Provision for Vacation Pay	-	19,670	(1,674)
	991,000	784,014	722,569
Gain on Disposal of Capital Assets	-	-	6
Net Operating Results	$ (991,000)	$ (775,960)	$ (721,692)

The accompanying notes and schedules are part of these financial statements.

STATEMENT OF FINANCIAL POSITION
FOR THE YEAR ENDED MARCH 31, 2010

	2010	2009
Assets		
Prepaid Expenses	$ 6,225	$ 59
Tangible Capital Assets (Note 4)	155,232	161,883
	$ 161,457	$ 161,942
Liabilities		
Accounts Payable and Accrued Liabilities	$ 35,656	$ 27,998
Accrued Vacation Pay	49,302	29,632
	84,958	57,630
Net Assets / (Net Liabilities)		
Net Assets (Liabilities) at Beginning of Year	104,312	(38,145)
Net Operating Results	(775,960)	(721,692)
Net Financing Provided from General Revenues	748,147	864,149
	76,499	104,312
	$ 161,457	$ 161,942

The accompanying notes and schedules are part of these financial statements.

STATEMENT OF CASH FLOWS
FOR THE YEAR ENDED MARCH 31, 2010

	2010	2009
Operating Transactions		
Net Operating Results	$ (775,960)	$ (721,692)
Non-cash Items included in Net Operating Results		
Amortization of Tangible Capital Assets	32,818	4,457
Valuation Adjustments	19,670	(1,674)
Gain on Disposal of Capital Assets	-	(6)
	(723,472)	(718,915)
(Increase)/ Decrease in Prepaid Expenses	(6,166)	3,632
Increase in Accounts Payable	7,658	11,444
Cash Applied to Operating Transactions	(721,980)	(703,839)
Capital Transactions		
Disposal of Tangible Capital Assets	-	6
Acquisition of Tangible Capital Assets	(26,167)	(160,316)
Cash Applied to Capital Transactions	(26,167)	(160,310)
Financing Transactions		
Net Financing Provided From General Revenues	748,147	864,149
Increase in Cash	-	-
Cash, Beginning of Year	-	-
Cash, End of Year	$ -	$ -

The accompanying notes and schedules are part of these financial statements.

Note 1 Authority

The Office of the Ethics Commissioner (the Office) operates under the authority of the *Conflicts of Interest Act* and the *Lobbyists Act*. The net cost of the operations of the Office is borne by the General Revenue Fund of the Province of Alberta. Annual operating budgets are approved by the Standing Committee on Legislative Offices.

Note 2 Purpose

The Office of the Ethics Commissioner enhances public confidence in the integrity of Members of the Legislative Assembly, former Ministers and former political staff members, and of the public service of Alberta by providing advice and guidance to Members and senior officials regarding their private interests in relation to their public responsibilities, by conducting investigations into allegations of conflicts of interest against Members, and by promoting the understanding by Members, senior officials and the public of the obligations regarding conflict of interest contained in legislation or directive.

The Office of the Ethics Commissioner is responsible for creating and maintaining a publicly-accessible lobbyists registry; providing advice and information to lobbyists and citizens on matters covered by the Lobbyists Act; and conducting investigations into possible contraventions of the Act which may require payment of an administrative penalty.

Note 3 Summary of Significant Accounting Policies and Reporting Practices

These financial statements are prepared primarily in accordance with Canadian generally accepted accounting principles for the public sector as recommended by the Public Sector Accounting Board (PSAB) of the Canadian Institute of Chartered Accountants. The PSAB financial statements presentation standard for government summary financial statements has been modified to more appropriately reflect the nature of the Office.

(a) Reporting Entity

The reporting entity is the Office of the Ethics Commissioner, for which the Ethics Commissioner is accountable.

The Office operates within the General Revenue Fund. The Fund is administered by the Minister of Finance and Enterprise. All cash receipts of the Office are deposited into the Fund and all cash disbursements made by the Office are paid from the Fund. Net financing provided from General Revenues is the difference between all cash receipts and all cash disbursements made.

(b) Basis of Financial Reporting

Revenues

All revenues are reported on the accrual basis of accounting.

Expenses

Directly Incurred

Directly incurred expenses are those costs the Office has primary responsibility and accountability for, as reflected in the Office's budget documents.

In addition to program operating expenses such as salaries, supplies, etc., directly incurred expenses also include:

- amortization of tangible capital assets.
- pension costs, which are the cost of employer contributions during the year.
- valuation adjustments which represent the change in management's estimate of future payments arising from obligations relating to vacation pay.

Incurred by Others

Services contributed by other entities in support of the Office's operations are not recognized and are disclosed in Schedule 2.

Assets

Financial assets are assets that could be used to discharge existing liabilities or finance future operations and are not for consumption in the normal course of operations. Financial assets of the Office are limited to prepaid expenses for office equipment.

Tangible capital assets of the Office are recorded at historical cost and are amortized on a straight-line basis over the estimated useful lives of the assets. The threshold for capitalizing new systems development is $250,000 and the threshold for major systems enhancements is $100,000. The threshold for all other tangible capital assets is $5,000.

Liabilities

Liabilities are recorded to the extent that they represent present obligations as a result of events and transactions occurring prior to the end of fiscal year. The settlement of liabilities will result in sacrifice of economic benefits in the future.

Net Assets / (Net Liabilities)

Net assets (net liabilities) represent the difference between the carrying value of assets held by the Office and its liabilities.

Valuation of Financial Assets and Liabilities

Fair value is the amount of consideration agreed upon in an arm's length transaction between knowledgeable, willing parties who are under no compulsion to act.

The fair values of accounts payable and accrued liabilities are estimated to approximate their carrying values because of the short term nature of these instruments.

NOTES TO THE FINANCIAL STATEMENTS
FOR THE YEAR ENDED MARCH 31, 2010

Note 4 Tangible Capital Assets

	Office equipment and furniture	Computer hardware and software	2010 Total	2009 Total
Estimated Useful Life	10 years	3 years		
Historical Cost*				
Beginning of Year	$ 33,448	$ 160,805	$ 194,253	$ 46,912
Additions	-	26,167	26,167	160,316
Disposals	-	-	-	(12,975)
	$ 33,448	$ 186,972	$ 220,420	$ 194,253
Accumulated Amortization				
Beginning of Year	$ 14,554	$ 17,816	$ 32,370	$ 40,888
Amortization Expense	3,276	29,542	32,818	4,457
Effect of Disposals	-	-	-	(12,975)
	$ 17,830	$ 47,358	$ 65,188	$ 32,370
Net Book Value at March 31, 2010	$ 15,618	$ 139,614	$ 155,232	
Net Book Value at March 31, 2009	$ 18,894	$ 142,989		$ 161,883

* Historical cost at March 31, 2009 includes work-in-progress totaling $137,208 comprised of computer hardware and software which was not amortized during the period.

Note 5 Defined Benefit Plans

The Office participates in the multiemployer pension plans, Management Employees Pension Plan and Public Service Pension Plan. The expense for these pension plans is equivalent to the annual contributions of $62,171 for the year ending March 31, 2010 (2009 – $50,591).

At December 31, 2009, the Management Employees Pension Plan reported a deficiency of $483,199,000 (2008 – $568,574,000) and the Public Service Pension Plan reported a deficiency of $1,729,196,000 (2008 – $1,187,538,000).

At December 31, 2009, the Supplementary Retirement Plan for Public Service Managers had a deficiency of $39,516,000 (2008 – $7,111,000).

The Office also participates in a multiemployer Long Term Disability Income Continuance Plan. At March 31, 2010, the Management, Opted Out and Excluded Plan reported an actuarial surplus of $7,431,000 (2009 – deficiency of $1,051,000). The expense for this plan is limited to employer's annual contributions for the year.

Note 6 Contractual Obligations

Contractual obligations are obligations of the Office to others that will become liabilities in the future when the terms of those contracts or agreements are met.

	2010	2009
Obligations under operating leases	$ 39,230	$ 3,205

Estimated payment requirements for the unexpired terms of these contractual obligations are as follows:

	Long-term Leases
2010-11	$ 6,194
2011-12	8,259
2012-13	8,259
2013-14	8,259
2014-15	8,259
	$ 39,230

Note 7 Related Party Transactions

The Office of the Ethics Commissioner received financial services from the Office of the Information and Privacy Commissioner. The agreement to provide these services terminated December 31, 2009. Supplies and Services from Support Arrangements with Related Parties, in the amount of $18,750 (2009 – $20,000) is included with voted expenses.

Note 8 Approval of Financial Statements

The financial statements were approved by the Ethics Commissioner.

SALARY & BENEFITS DISCLOSURE
FOR THE YEAR ENDED MARCH 31, 2010

Schedule 1

	2010				2009
	Base Salary[a]	Other Cash Benefits[b]	Other Non-cash Benefits[c]	Total	Total
Senior Official Ethics Commissioner[d]	$ 124,728	$ 17,621	$ 29,048	$ 173,397	$ 158,612

Prepared in accordance with Treasury Board Directive 12/98 as amended.

(a) Base salary includes regular base pay.
(b) Other cash benefits include vehicle allowance for nine months and accumulated vacation of $11,659 was paid to the Commissioner in 2010.
(c) Other non-cash benefits include the government's share of all employee benefits and contributions or payments made on behalf of employee, including pension, health care, dental coverage, group life insurance, short and long term disability plans, professional memberships and tuition fees (as applicable).
(d) Automobile provided for three months, no dollar amount included in other non-cash benefits.

ALLOCATED COSTS
FOR THE YEAR ENDED MARCH 31, 2010

Schedule 2

	2010					2009
		Expenses – Incurred by Others		Valuation Adjustments		
Program	Expenses [a]	Accommodation Costs[b]	Telephone Costs[c]	Vacation Pay[d]	Total Expenses	Total Expenses
Operations	$ 764,344	$ 57,915	$ 1,318	$ 19,670	$ 843,247	$ 770,768

(a) Expenses – Directly Incurred as per Statement of Operations, excluding valuation adjustments.
(b) Costs shown for Accommodation include grants in lieu of taxes.
(c) Telephone Costs is the line charge for all phone numbers.
(d) Valuation Adjustments as per Statement of Operations.

Further information on the functions and responsibilities of the Office of the Ethics Commissioner may be obtained by contacting the office:

Office of the Ethics Commissioner

1250, 9925 - 109 Street, Edmonton, Alberta T5K 2J8
Phone: (780) 422-2273 Fax: (780) 422-2261
E-mail: generalinfo@ethicscommissioner.ab.ca
Website: www.ethicscommissioner.ab.ca

Further information on the *Lobbyists Act* or the functions and responsibilities of the Registrar, *Lobbyists Act*, may be obtained by contacting the:

Registrar, *Lobbyists Act*

1250, 9925 - 109 Street, Edmonton, Alberta T5K 2J8
Phone: (780) 644-3879 Fax: (780) 422-2261
E-mail: registrar@ethicscommissioner.ab.ca
Website: www.LobbyistsAct.ab.ca

Office of the Ethics Commissioner

Annual Report 2009/10